

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO, VASSIKI CHAUHAN,
SASHA BRIETZKE, ANNEMARIE BROWN,
ANDREA COURTNEY, MARISSA EVANS,
and JANE DOE,**

CASE NO. 1:18-cv-01070

*Plaintiffs, on behalf of themselves and all
others similarly situated,*

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendants.

**ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE* OF
DEBORAH K. MARCUSE, ESQUIRE**

Pursuant to Local Rule 83.2(b), the undersigned respectfully moves for the admission *pro hac vice* of Deborah K. Marcuse, Esquire, of Sanford Heisler Sharp, LLP, 400 East Pratt Street, 8th Floor, Baltimore, Maryland 21202, 410-834-7415 (direct), 410-834-7420 (office), 410-834-7425 (facsimile), dmarcuse@sanfordheisler.com, for purposes of appearance as co-counsel on behalf of the Plaintiffs in the above-captioned case only. In support of this Motion, the undersigned states as follows:

1. Movant, Charles G. Douglas, III, Esquire, of the law firm of Douglas, Leonard & Garvey, P.C., 14 South Street, Suite 5, Concord, NH 03301, is a member in good standing of the New Hampshire Bar and the United States District Court for the District of New Hampshire.

2. Deborah K. Marcuse is not admitted to practice in the United States District Court for the District of New Hampshire. She is a member in good standing of the bars of Connecticut, New York, District of Columbia, and Pennsylvania; the United States District Courts for the Eastern and Southern Districts of New York, District of Columbia, District of Connecticut, and

Western District of Pennsylvania; the United States Court of Appeals for the Second Circuit; and, the United States Supreme Court.

3. Deborah K. Marcuse is not currently suspended or disbarred in any jurisdiction, and there are no disciplinary proceedings pending against her.

4. Deborah K. Marcuse is familiar with the Local Rules of the United States District Court for the District of New Hampshire.

5. In accordance with the Local Rules of this Court, Deborah K. Marcuse's affidavit in support of this Motion has been attached as Exhibit A.

6. In accordance with the Local Rules of this Court, Deborah K. Marcuse has made payment of this Court's \$100.00 admission fee contemporaneously with the filing of this Motion.

7. In accordance with the Local Rules of this Court, Deborah K. Marcuse will register as a Filing User of the Court's ECF system by completing an online registration form on the Court's website at www.nhd.uscourts.gov.

8. Opposing counsel, Joan A. Lukey, Esq., assented to the relief requested herein.

9. Because the relief requested herein is discretionary with the Court, no accompanying memorandum of law is believed to be required.

WHEREFORE, Charles G. Douglas, III, Esquire, moves this Court to enter an Order for Deborah K. Marcuse, Esquire, to appear before this Court on behalf of Plaintiffs for all purposes relating to the proceedings in the above-captioned matter.

Respectfully submitted,
PLAINTIFFS
By their attorneys,
DOUGLAS, LEONARD & GARVEY, P.C.

Date: November 30, 2018

By: /s/ Charles G. Douglas, III
Charles G. Douglas, III (NH Bar No. 669)
DOUGLAS, LEONARD & GARVEY, P.C.
14 South Street, Suite 5
Concord, NH 03301
Phone: (603) 224-1988
Fax: (603) 229-1988
chuck@nhlawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically served via ECF to all counsel of record on this 30th day of November 2018.

/s/ Charles G. Douglas, III
Charles G. Douglas, III